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NORTH DAKOTA  
202-224-2043

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COMMITTEES  
AGRICULTURE, NUTRITION,  
AND FORESTRY  
FINANCE  
BUDGET  
INDIAN AFFAIRS

# United States Senate

WASHINGTON, DC 20510-3403

December 17, 1996

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, Room 814  
Washington, DC 20554

RECEIVED  
DEC 19 1996  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**RE: CC Docket 96-45**  
**Comments on Universal Service Recommended Decision**

Dear Mr. Chairman:

Thank you for the opportunity to submit additional data in support of the recommendation of the FCC Advisory Committee in Telecommunications and Health Care. On behalf of my North Dakota constituents, I would also like to express appreciation for the FCC's extension of the deadline for these comments; the additional three days allowed North Dakota practitioners to submit complete responses to the questions raised by your request for comments. These responses are attached.

In my discussions with North Dakota telehealth providers, it is clear that the realities of daily rural telehealth practice leave little time for data gathering: dedicated North Dakota practitioners focus their energy on supplying appropriate, high-quality clinical services. These practitioners are already convinced that telehealth is both clinically appropriate and cost-effective: the proof lies in the fact that physicians, psychologists, nurse practitioners, physician assistants, and social workers all across my state are using telehealth to treat more patients across greater distances. However, it is also clear that high telecommunication rates are inhibiting the further development of telehealth.

I urge the FCC to accept and endorse the recommendations of the Advisory Committee. I appreciate that the Joint State Board is concerned that without more data, it may be difficult to estimate the total cost to the Universal Services fund if the recommendations are fully implemented. However, telehealth lies at a crucial point in its development, and if we do not find ways as a nation to support it, this promising mechanism for supplying specialty care, education, and health information to underserved rural communities may not reach its full potential.

Sincerely,



KENT CONRAD  
United States Senate

KC:wdwn

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**RECEIVED**

**DEC 19 1996**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

**The Comments of**

**North Dakota Telehealth Service Providers**

**to the**

**Federal Communications Commission**

**regarding the**

**Pending Universal Service Recommended Decision**

**CC Docket 96-45**

**Submitted December 19, 1996**



December 13, 1996

Mr. David Nickelson  
United States Senate  
724 Hart Senate Building  
Washington, DC 20510-3403

Dear David Nickelson,

Here is the information that you requested regarding telecommunication rates for the TeleCare Network in North and South Dakota. I am writing on behalf of the 22 member facilities in the TeleCare Network, to provide information regarding the telephone rates and installation charges. **It is essential that these rates become truly affordable for the small rural hospital or clinic, in order to see the kind of access to specialty physician services that is needed for citizens living in these communities.**

Each member of the TeleCare Network would look to see these rates become as affordable as Texas (i.e. \$260/month), with no increase due to the distance away from the consulting specialty site. In Texas, this \$260 rate is 105% of the telephone company's cost for delivering this type of services. This price range is what struggling rural health care facilities need to remain competitive in offering a full range of services at the local level. For some, even this price may be too high. The high cost of installation is also something that could be addressed, it was not uncommon for us to be billed \$1,200 for each new site added, in addition to the monthly rate of often times > \$1,000 per month.

Our experience in providing telemedicine interactive consultative services has shown that it is essential that the minimum standard for transmission medium be the full T-1 bandwidth. The physicians need this quality of telephone service in order to evaluate the patient using the same standards of image resolution that they would see if evaluating the patient in person.

Our experience, working with 8 different small telephone companies, over the last 3 days in trying to gather the information you requested has been a truly enlightening experience! We have found that the individuals working at these small "central offices" have been helpful in trying to provide the information that we requested, but it is difficult for them to provide specific answers to our questions. When first contacted, they would answer the specific question asked, but would not offer any additional information. Quite frankly, it seems that this may be the first time that anyone has asked them these types of questions. As we became more specific with our questions, they would try to answer but

900 East Broadway Box 5510  
Bismarck, North Dakota 58506-5510  
701-224-7000  
FAX 701-224-7284  
TDD 701-224-7946

a member of **PrimeCare**  
health group

Mr. David Nickelson  
December 13, 1996  
Page 2

many times they needed to research the question and call back with the information.

It seems that there is no consistent way that pricing information is calculated. They are in a transition period because so many have recently been sold off by US West and are not always knowledgeable about the specific pricing. There is different pricing for each part of the T-1 line depending which phone company you are working with. In our situation, we are working with 8 DIFFERENT phone companies. In one link of our network we must pass through 4 different areas of telephone company coverage in order to provide a link with one of the more distant sites. This makes it very challenging to identify the specific costs involved because each phone company bills separately for their part of the telephone linkage.

All phone companies indicate that their rates are tariffed. Most follow the US West or NECA tariffs. One sets their own tariffs with the assistance of consultants. Also, in all areas there is a per mile rate that ranges from \$11.62-19.46 per mile. There appears to be no room for negotiation on these line rates, its as if "their hands are tied", or at least that's what they want us to believe.

Thank you for your assistance in forwarding this information to the appropriate individuals for consideration by the Federal Communications Commission. I encourage you to call me if you have any further questions at 701-224-7130. Have a Merry Christmas!

Sincerely,

*Shari Frueh, RN*

Shari Frueh, RN  
Telemedicine Coordinator

enclosures



**St. Alexius TeleCare Network  
Bismarck, ND  
Current Members**

**NORTH DAKOTA**

1. Garrison Memorial Hospital
2. Garrison Family Clinic
3. Turtle Lake Hospital
4. Harvey St. Aloisius Medical Center
5. Hazen Sakakawea Medical Center
6. Beulah Missouri Slope Clinic
7. Hettinger West River Regional Medical Center
8. Hettinger Clinic
9. New Town Health Clinic
10. New Town Minne-Tohe Clinic Indian Health Services
11. Williston- Mercy Hospital
12. St. Vincent's Care Center
13. Missouri Slope Care Center
14. Baptist Home
15. Glen Ullin Marian Manor
16. Glen Ullin Clinic
17. Wishek Community Hospital

**SOUTH DAKOTA**

1. McLaughlin West River Clinic
2. Mobridge Regional Hospital
3. Isabel Clinic
4. Eagle Butte Community Clinic
5. Eagle Butte Indian Health Services

**Questions to Address:**

1. Name of project:

St. Alexius TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

*\* See attached sheet for complete listing*

Name of Site:

State in which it is located:

Garrison Memorial HospitalNorth DakotaGarrison Family ClinicNorth Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck Distance from city boundary: 72 miles

4. Name of the project's telecommunications service provider:

Reservation Telephone - new carrier (no ~~new~~ new data)US West - current rates

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video, voice grade for EKG Management Program

Carrison cont.

## 6. Charges for telecommunications service:

Is there a monthly charge? No Yes ☒

If yes, how much is the charge?

\$ 633

Is there a usage-based charge? No ☒ Yes ☐

If yes, how much is the charge?

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☒

If yes, how much is the charge?

\$14.99/mile for 36 month contract  
otherwise \$17.00/mileWas there an installation fee? No ☐ Yes ☒

If yes, how much was the charge?

\$1039

Is the charge the regular tariffed rate, or is there a discount from the telecommunications provider? Tariffed ☒ Discount ☐

If there is a discount, how much is it?

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

medical and mental health video consultations  
routine and urgent medical care  
x-rays, 12 lead EKG transmissions  
continuing education for health care staff  
Hospice Care conferences

**Questions to Address:**

1. Name of project:

St. Alexius TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site: State in which it is located:

Turtle Lake Community Hospital North Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck Distance from city boundary: 63 miles

4. Name of the project's telecommunications service provider:

West River Telecom. Cooperative

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for EKG management program



Turtle Lake cont.

6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒ \$1,121  
If yes, how much is the charge? \_\_\_\_\_

Is there a usage-based charge? No ☒ Yes ☐  
If yes, how much is the charge? \_\_\_\_\_

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☒  
If yes, how much is the charge? part \$11.62/mile rest \$14.99/mile  
for a 36 month contract, otherwise \$17/mile

Was there an installation fee? No ☐ Yes ☒ \$1039  
If yes, how much was the charge? \_\_\_\_\_

Is the charge the regular tariffed rate, or is there a discount from the telecommunications provider? Tariffed ☒ Discount ☐  
If there is a discount, how much is it? \_\_\_\_\_

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

Same as Garrison, ND

**Questions to Address:**

1. Name of project:

St. Alexis TeleCare Network

2. Please list each of the project's sites:

Name of Site:

New Town Health Clinic

State in which it is located:

North Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 137 miles

4. Name of the project's telecommunications service provider:

Reservation Telephone Co.

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for the EKE Management Program

NT Health Clinic cont.

6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒

If yes, how much is the charge? \$1401

Is there a usage-based charge? No ☒ Yes ☐

If yes, how much is the charge? \_\_\_\_\_

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☒

If yes, how much is the charge? \$14.99/mile 36month contract  
otherwise it's \$17/mile

Was there an installation fee? No ☐ Yes ☒

If yes, how much was the charge? \$600

Is the charge the regular tariffed rate, or is there a discount from the telecommunications provider? Tariffed ☒ Discount ☐

If there is a discount, how much is it? \_\_\_\_\_

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

Same as Garrison, ND

**Questions to Address:**

1. Name of project:

St. Alexis TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site:

State in which it is located:

New Town Minne-Toke ClinicNorth Dakota(Indian Health Services Facility)

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 139 miles

4. Name of the project's telecommunications service provider:

Reservation Telephone Co.

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for the  
EKG Management Program

NT Minnetonka Clinic

6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒ \$ 126.90  
If yes, how much is the charge? \_\_\_\_\_

Is there a usage-based charge? No ☒ Yes ☐  
If yes, how much is the charge? \_\_\_\_\_

Is there a distance component (such as a per-mile fee) of the charge? No ☒ Yes ☐  
If yes, how much is the charge? \_\_\_\_\_

Was there an installation fee? No ☐ Yes ☒ \$600  
If yes, how much was the charge? \_\_\_\_\_

Is the charge the regular tariffed rate, or is there a discount from the telecommunications provider? Tariffed ☒ Discount ☐  
If there is a discount, how much is it? \_\_\_\_\_

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

Same as Garrison, ND

**Questions to Address:**

1. Name of project:

St. Alexius Tele Care Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site:

State in which it is located:

Hazen Sakakawea Medical CenterNorth Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 67 miles

4. Name of the project's telecommunications service provider:

West River Telecommunications Coop.

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for the Electroencephalogram network, pneumocardiogram Network

Haren cont.

6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒

If yes, how much is the charge? \_\_\_\_\_

\$1,043

Is there a usage-based charge? No ☒ Yes ☐

If yes, how much is the charge? \_\_\_\_\_

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☒

If yes, how much is the charge? \_\_\_\_\_

\$11.62/mile

Was there an installation fee? No ☐ Yes ☒

If yes, how much was the charge? \_\_\_\_\_

\$1,039

Is the charge the regular tarrified rate, or is there a discount from the telecommunications provider? Tarrified ☒ Discount ☐

If there is a discount, how much is it? \_\_\_\_\_

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

Same as Garrison, ND  
Plus teleradiology services

**Questions to Address:**

1. Name of project:

St. Alexius TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site:

Bentley Missouri Slope Clinic

State in which it is located:

North Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 76 miles

4. Name of the project's telecommunications service provider:

West River Telephone Cooperative

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network



*Beulah cont.*

6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒

If yes, how much is the charge? \$286

Is there a usage-based charge? No ☒ Yes ☐

If yes, how much is the charge? \_\_\_\_\_

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☒

If yes, how much is the charge? \$11.62

Was there an installation fee? No ☐ Yes ☒

If yes, how much was the charge? \$439

Is the charge the regular tariffed rate, or is there a discount from the telecommunications provider? Tariffed ☒ Discount ☐

If there is a discount, how much is it? \_\_\_\_\_

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

Same as Garrison, ND

**Questions to Address:**

1. Name of project:

St. Alexius TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site:

State in which it is located:

Glen Ullin Marian ManorNorth DakotaGlen Ullin ClinicNorth Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 56 miles

4. Name of the project's telecommunications service provider:

West River Telecommunication Coop.

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for the Ekb management program

Glen Ullin cont.

6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒

If yes, how much is the charge?

\$673

Is there a usage-based charge? No ☒ Yes ☐

If yes, how much is the charge?

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☒

If yes, how much is the charge?

\$ 11.62 per mile

Was there an installation fee? No ☐ Yes ☒

If yes, how much was the charge?

\$900

Is the charge the regular tariffed rate, or is there a discount from the telecommunications provider? Tariffed ☒ Discount ☐

If there is a discount, how much is it?

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

Same as Garrison, ND

**Questions to Address:**

1. Name of project:

St. Alexius TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site: State in which it is located:

Hettinger Regional Medical Center North DakotaHettinger Clinic North Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 166 miles

4. Name of the project's telecommunications service provider:

CTC Comm. Inc.

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for the Ekb management Program and EEG Network

Nettinger cont.

6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒

If yes, how much is the charge?

\$2,023

Is there a usage-based charge? No ☒ Yes ☐

If yes, how much is the charge?

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☒

If yes, how much is the charge?

\$17.00/mile

Was there an installation fee? No ☐ Yes ☒

If yes, how much was the charge?

\$1,200

Is the charge the regular tariffed rate, or is there a discount from the telecommunications provider? Tariffed ☒ Discount ☐

If there is a discount, how much is it?

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

Same as Garrison, ND

Plus Employee assistance Counseling

Post-surgical evaluations

Also teleradiology to their own satellite clinics  
as well as linking to St. Alexius.

**Questions to Address:**

1. Name of project:

St. Alexis TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site:

State in which it is located:

Williston Mercy Medical CenterNorth Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 225 miles

4. Name of the project's telecommunications service provider:

US West

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for the EEG network

**Questions to Address:**

1. Name of project:

St. Alexius TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site: State in which it is located:

<u>Wishek Community Hospital</u>	<u>North Dakota</u>
<u>Wishek Clinic</u>	<u>North Dakota</u>

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck, ND Distance from city boundary: 103 miles

4. Name of the project's telecommunications service provider:

Bek

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, Voice grade for the Ekb Management program, and EE6 Network

*Williston Cont.*

## 6. Charges for telecommunications service:

Is there a monthly charge? No ☐ Yes ☒

If yes, how much is the charge?

*\$3,763*Is there a usage-based charge? No ☒ Yes ☐

If yes, how much is the charge?

Is there a distance component (such as a per-mile fee) of the charge? No ☐ Yes ☐

If yes, how much is the charge?

*\$14.99/mile*Was there an installation fee? No ☐ Yes ☒

If yes, how much was the charge?

*\$1,200*Is the charge the regular tarrified rate, or is there a discount from the telecommunications provider? Tarrified ☒ Discount ☐

If there is a discount, how much is it?

7. How does the project use telecommunications in the delivery of health care? (For example -- to send x-rays, distribute public health information, or perform video consultations. Please identify any occasional or episodic uses, such as might result from an outbreak of disease.)

*Same as Garrison, ND**Patient care conference for dialysis*



**Questions to Address:**

1. Name of project:

St. Alexius TeleCare Network, Bismarck, ND

2. Please list each of the project's sites:

Name of Site:

State in which it is located:

Harvey St. Aloisius Medical CenterNorth Dakota

Please answer the following questions for each of your sites.  
Use additional sheets if necessary.

3. What is the nearest city of population equal to or greater than 50,00 in your state, and approximately how far are you from its boundary?

City: Bismarck Distance from city boundary: 105 miles

4. Name of the project's telecommunications service provider:

N.D. Telephone Company

5. Level of telecommunications service the project is currently using: (For example, voice grade, 144 Kbps (ISDN), 384 Kbps, T-1 or equivalent)

T-1 for interactive video network, voice grade for the Ekb management program